

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

<p>Boyuhao Wang and Dongguanshihuangfutoudianziyouxiangongsi a/k/a Noahcam Security Camera</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">-against-</p> <p>Laview Eagle Eye Technology Inc.</p> <p style="text-align: center;">Defendant.</p>	<p>X</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>X</p>	<p>Civil Action No.: 7:24-cv-01822</p> <p>Judge: Honorable Nelson S. Roman</p>
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RESQUEST TO ACCEPT THE AMENDED COMPLAINT

Plaintiffs, Boyuhao Wang and Dongguanshihuangfutoudianziyouxiangongsi a/k/a Noahcam Security Camera (hereinafter "Wang" and "Noahcam" respectively or "Plaintiffs" collectively) respectfully request that the Court accept Plaintiffs' Amended Complaint (Dkt. # 17) under F.R.C.P. Rule 15(a) *Amending as a Matter of Course*.

Rule 15(a)(1)(B) specifically requires that "A party may amend its pleading once as a matter of course no later than... 21 days after service of a motion under Rule 12(b), (e), or (f)..."

On May 22, 2024, Defendant Laview Eagle Eye Technology Inc. ("Laview") served, but not filed, its motion to dismiss under Rule 12(b) (Exhibit 1). Plaintiffs have until June 11, 2024 to file any amendment to their original complaint under Rule 15(a)(1)(B).

Plaintiffs timely filed their amended complaint on May 31, 2024, within 21-day window from the May 21, 2024 filing date of Laview's 12(b) motion to June 10, 2024 and Rule 15(a)(1)(B) allows Plaintiffs to make such an amendment to their complaint once a matter of course.

<p>USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: <u>06/14/2024</u></p>
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MEMO ENDORSED

In addition, Laview locked down Plaintiffs' e-commerce store in close collaboration with Amazon.com, Inc. They stopped Plaintiffs' sale of the Light Bulb Camera in the State of New York through "extra-judicial patent enforcement." Such extra-judicial patent enforcement by Laview and Amazon.com, Inc. continues as of today as the parties litigate in this case.

Therefore, acceptance/entry of Plaintiffs' Amended Complaint (Dkt. #17) with the addition of Amazon.com, Inc. as a co-defendant, is respectfully requested.

Plaintiffs

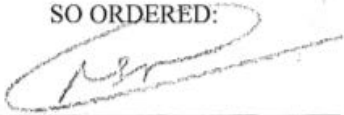
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Dated: June 3, 2024

**Per the Court's April 23, 2024 endorsement, Defendant was to serve their moving papers in support of a motion to dismiss on May 23, 2024 and provide Chambers with two physical courtesy copies of their motion papers on the same date they are served on opposing counsel. (ECF No. 16.) To date, the Court has not received Defendant's moving papers and now DIRECTS Defendant to respond as to their status.**

**Dated: June 14, 2024  
White Plains, NY**

SO ORDERED:

  
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NELSON S. ROMÁN  
United States District Judge